

U.S. Nuclear Regulatory Commission

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ENCLOSURE 1
WATTS BAR NUCLEAR PLANT (WBN)
RESPONSE TO NOTICE OF VIOLATION
50-390, 391/91-04-03

DESCRIPTION OF VIOLATION

Part 50 of Title 10 of the Code of Federal Regulations, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," are implemented in part by the TVA Nuclear Quality Assurance Plan (NQAP), paragraph 6.0, which endorses ANSI N45.2-1971 and states that quality-related activities shall be prescribed by documented procedures and instructions and shall be performed in accordance with approved and controlled instruction, procedures, and drawings.

Administrative Instruction (AI)-1.60, "Implementing Nuclear Procedures System Documents and Maintaining a Cross Reference Matrix," paragraph 3.1.3.C, requires implementation of Program Manual Procedures (PMP), for which compliance is mandatory, within 90 days of the issue date specified in the PMP revision log unless other written implementation directions are provided within the PMP. Specification Revision Notice (SRN) G-38-94 was issued on August 31, 1990, and specified an implementation date of 30 days (by September 30, 1990).

Contrary to the above, SRN G-38-94 was not incorporated into site construction procedure CPI-8.1.8-E-105, until November 10, 1990. Work activities were performed on workplans K-M11600A-1 and K-M12422A in accordance with CPI-8.1.8-E-105 during the delinquent period.

ADMISSION OR DENIAL OF VIOLATION

TVA admits the violation occurred as stated.

REASON FOR VIOLATION

The primary reason for the violation was failure to provide administrative controls that would prevent the use of delinquent procedures for work activities. Contributing to this cause were management/process weaknesses which impacted timely incorporation of upper-tier document changes into lower-tier procedures (the "rolldown" process). Successful implementation of this process requires efficient upfront coordination, prompt attention by affected departments, and an efficient procedure revision process. As discussed below, weaknesses in these areas resulted in late implementation of upper-tier documents into onsite procedures.

Coordination:

A factor which led to late procedure implementation was inefficient upfront coordination of changes to upper-tier documents including establishment of reasonable implementation dates and early notification to affected departments of potential procedure impacts. Implementation dates specified in proposed revisions to upper-tier documents were often not well coordinated between corporate and site staffs during the review cycle of the proposed document. It was seldom recognized during the review cycle that unrealistic implementation dates (as proposed) could be challenged. Complicating this were unclear definitions for "effective date," "implementation date," and "effective immediately." The result, in some cases, was issuance of upper-tier documents having little or no lead time. Additional delays were the result of inefficient distribution of upper-tier documents.

Management Attention:

The rolldown process requires prompt attention by the affected onsite department to review the upper-tier change, and revise and obtain approval for the impacted site procedure. Weak oversight by some onsite department managers and failure to hold subordinate personnel accountable for resolution of open procedure items¹ allowed late implementation to continue without correction.

WBN Procedure Process:

A cumbersome procedure process at WBN including lengthy revision cycles further contributed to late implementation. Additionally, in 1990, the procedure revision process was overloaded due to a surge from approximately 600 items (normal annual load) to nearly 3,000 review items. The surge was the result of a broad initiative to revise corporate procedures. Also, there was no clear mechanism (e.g., on the basis of a technical evaluation) to extend or receive relief from unattainable implementation dates. This inflexible process led to a complacency concerning the dispositioning of late procedure items.

Other Site Procedures:

Several site departments are required to implement upper-tier documents that fall outside the cross-reference process controlled by Site Standard Practice (SSP)-2.4 (formerly AI-1.60). These documents are primarily administrative in nature and affect procedures internal to specific disciplines. TVA's preliminary review of these processes could not confirm timely disposition of upper-tier requirements.

1. Each "item" involves notification to a site department of an upper-tier document change. Multiple "items" may exist for each change.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

WBN has implemented a process to prevent delinquent procedures from being used in the performance of work activities. SSP-2.4 and AI-4.8 were issued to include management controls to administratively "HOLD" outdated work-related procedures. Procedures in HOLD status will not be issued (for work activities) from document control centers and may not be used to perform work.

In order to focus management attention on outstanding procedure items and to promptly identify potential delays (e.g., resources, competing priorities), site departments have been directed to place their items in the site integrated schedule. Furthermore, a regular agenda item has been established for the rolldown activity to allow managers to report their department's progress in weekly site schedule meetings. This approach will provide senior management an opportunity to monitor procedure rolldown implementation and identify weak performance.

WBN instituted an improved procedure system on May 17, 1991 (SSP-2.3). As a result of streamlining the concurrence process, the improved system is expected to result in a timely procedure revision cycle and should reduce the likelihood of late incorporation of upper-tier documents into site procedures.

As an enhancement to strengthen the rolldown process, TVA corporate administrative documents will be revised as necessary by August 15, 1991 to include the following elements: (1) prompt transmittal of parallel versions of approved documents to WBN Site Procedures, and (2) appropriate use of the terms "effective date," "implementation date," and "effective immediately." In addition, the need to coordinate implementation dates with site departments has been reiterated to corporate staffs.

Extent of Condition:

TVA is continuing to evaluate cases of untimely disposition of upper-tier requirements to ensure there has been no impact from using outdated procedures to perform work at WBN. TVA performed (or is performing) an evaluation of 382 changes/revisions to a defined population² of upper-tier documents where the change was either (1) late when incorporated into WBN site procedures (e.g., closed late) or (2) late and not dispositioned as of May 28, 1991 (date when work procedures were placed in HOLD).

Of 253 evaluated items, TVA found that for 230 there would have been no adverse impact from using site procedures to perform work without having incorporated the revised upper-tier document. The remaining 23 items require further evaluation to determine whether plant work was adversely affected. Included in this population is the cited example of late incorporation of SRN G-38-94. Evaluations for 129 items are still to be performed. TVA will complete evaluations for the 152 items (23 indeterminate and 129 unevaluated) by July 15, 1991.

2. Upper-tier documents whose onsite implementation is tracked under SSP-2.4. These documents represent the majority of upper-tier source procedures affecting onsite work procedures (construction, maintenance, testing, etc). Since March 1987, 5012 change items were assigned.

On May 28, 1991, TVA placed an administrative HOLD on the use of approximately 73 work-related procedures affected by the above 152 incomplete evaluations.

An evaluation is also required to determine whether upper-tier documents outside the scope of the SSP-2.4 process have been delinquent, and if so, whether the delinquency impacts plant hardware. Because these documents are primarily administrative in nature, no impact on the plant is expected. This evaluation will be complete by July 15, 1991.

STEPS TO BE TAKEN TO AVOID FURTHER VIOLATION

The evaluations discussed above will be complete by July 15, 1991.

By June 30, 1991, late items will be dispositioned in accordance with SSP-2.4. This process currently requires that open items be closed, evaluated, placed in HOLD, or have an authorized extension.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

WBN will be in compliance by July 15, 1991.

ENCLOSURE 2

LIST OF COMMITMENTS

1. Complete the evaluations discussed in the response by July 15, 1991.
2. By June 30, 1991, late items will be dispositioned in accordance with Site Standard Procedure 2.4.
3. Evaluate whether items outside the scope of the SSP-2.4 process have been delinquent, and if so, whether the delinquency impacts the plant. This evaluation will be complete by July 15, 1991.
4. TVA corporate administrative documents will be revised as necessary by August 15, 1991, to include the following elements: (1) prompt transmittal of parallel versions of approved documents to WBN Site Procedures, and (2) appropriate use of the terms "effective date," "implementation date," and "effective immediately."
5. TVA will provide a supplemental response summarizing the results of additional evaluations by July 31, 1991.